

**LOCAL BANKRUPTCY FORM 5071-1**  
**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : BANKRUPTCY NO. 5-15-02647(JJT)  
SCOTT HALPERN :  
Debtor(s) : CHAPTER 13  
:  
And :  
ROSEMARY HALPERN : Nature of Proceeding: Request Continuance  
Co-Debtor : of Hearing for Reasons stated below:  
:  
ALLY FINANCIAL INC. :  
Movant(s) :  
:  
SCOTT HALPERN : Pleading: Ally Financial Inc.'s Motion for  
CHARLES J. DEHART, III, Trustee : Relief from the Stay  
Respondent(s) : Document #: 81

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the Continuance.

Request more time for Ally Financial Inc. and the Debtor to work out a resolution.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: May 9, 2017

s/ Regina Cohen

Attorney for Ally Financial Inc.  
Regina Cohen, Esquire  
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